

1 J Christopher Jorgensen
Nevada Bar No. 5382
2 LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
3 Las Vegas, NV 89169
Phone: (702) 949-8200
4 Fax: (702) 949-8398
Email: cjorgensen@lrrc.com

5 *Attorneys for Defendant*
6 *Synchrony Bank*

7
8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 ANTHONY DESMOND FLORIAN and THO
10 NGUYEN,

11 Plaintiffs,

12 vs.

13 CHEX SYSTEMS, INC., EQUIFAX
14 INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
15 INC., TRANS UNION LLC, AFFIRM, INC.,
BANK OF AMERICA, N.A., CAPITAL ONE
16 BANK (USA), N.A., CITIBANK, N.A.,
DEPARTMENT STORES NATIONAL
17 BANK, INTOUCH CREDIT UNION,
SYNCHRONY BANK, and U.S. BANK, N.A.,

18 Defendants.

Case No.: 2:18-cv-01216-GMN-PAL

**STIPULATION TO EXTEND
DEFENDANT SYNCHRONY
BANK'S TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Compl. Filed: July 3, 2018

Hon. Judge Gloria Maria Navarro
Hon. Magistrate Judge Peggy A. Leen

19 This Stipulation to Extend Defendant Synchrony Bank's Time to Respond to
20 Complaint is made by and between Plaintiffs Anthony Desmond Florian and Tho Nguyen
21 ("Plaintiffs") and Defendant Synchrony Bank ("Synchrony") through their respective counsel,
22 in light of the following facts:

23 RECITALS

24 A. Plaintiffs filed the Complaint ("Complaint") against Synchrony on or about
25 July 3, 2018.

26 B. Synchrony was served with the Complaint on or about July 9, 2018.

27 C. Synchrony's current deadline to respond to the Complaint is July 30, 2018

28 D. The parties agreed that Synchrony would have through August 27, 2018 to

1 respond to the Complaint in order to give Synchrony time to investigate Plaintiffs' claims and
2 prepare a proper response, and for the parties to discuss a potential resolution of this matter.

3 E. There is good cause to grant this stipulation because Synchrony requires
4 additional time to investigate Plaintiffs' claims and prepare a proper response, and the parties
5 require additional time to consider a resolution of this matter.

6 F. This stipulation is filed in good faith and not intended to cause delay.

7 G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Synchrony
8 respectfully request that the Court extend Synchrony's time to respond to Plaintiffs'
9 Complaint through August 27, 2018.

10 STIPULATION

11 NOW, THEREFORE, Plaintiffs and Synchrony hereby stipulate and agree that
12 Synchrony has up to and including August 27, 2018, to file a response to Plaintiffs'
13 Complaint.

14 **IT IS SO STIPULATED.**

15 DATED this 27th day of July, 2018.

DATED this 27th day of July, 2018.

16 **LAW OFFICE OF**
17 **KEVIN L. HERNANDEZ**

LEWIS ROCA
ROTHGERBER CHRISTIE LLP

18 By: /s/ Kevin L. Hernandez
19 Kevin L. Hernandez, Esq.
20 Nevada Bar No. 12594
21 2510 Wigwan Parkway, Suite 206
Henderson, Nevada 89074
Tel: 702-563-4450
Email: kevin@kevinhernandezlaw.com

By: /s/ J Christopher Jorgensen
J Christopher Jorgensen, Esq.
Nevada Bar No. 5382
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Tel: 702-949-8200
Email: cjorgensen@lrrc.com

22 *Attorney for Plaintiffs*
23 *Anthony Desmond Florian*
and Tho Nguyen

Attorneys for Defendant
Synchrony Bank

24 ORDER

25 **IT IS SO ORDERED.**

26 
27 United States Magistrate Judge

28 DATED July 30, 2018